

f. Shawn Menne aka Red Rawler, also of Philadelphia



403. Paul Minton, also of Philadelphia



404. Unlike Defendants, who coordinated with law enforcement throughout the events here in dispute, Plaintiffs and their criminal co-conspirators specifically chose not to inform law enforcement of their activities.



Emily G ✓
@EmilyGorcenski

One of my favorite parts of the "Emily is a fed" criticism is that when the decision was made to not show up on August 11, I was asked to call the cops to tell them about the torch march, and I refused.



 ruth badrd ginsberg @isisRVA · Sep 20

In order to do something you apparently have to lick the boots of those that turned the other cheek when we were almost murdered and then somehow make the entire narrative about you but yeah you keep on keeping on buddy
twitter.com/EmilyGorcenski...

1:47 AM · Sep 20, 2019 · Twitter for iPhone

4 Retweets 43 Likes



Emily G @EmilyGorcenski · Sep 20

Replying to @EmilyGorcenski

There were quite a lot of antifascist groups in Virginia when August 11 happened. Yet somehow there were only about 30-40 people at UVA; most students and community members.

Instead of mutual aid, we were explicitly expected to rely on the cops.



Emily G @EmilyGorcenski · Sep 20

"Emily, will you use your social media profile to help us spread awareness about what's happening in Charlottesville this summer" was the **explicit** request I was asked in 2017. I was **literally asked to be public and identifiable**.

Stirg @Carzonfive · Sep 20

Replies to @meanvideo games @GilesShurtleff and 5 others

This is an automatic message from my mobile device.

405. If Plaintiffs make a choice to keep company with violent criminals, and
those violent criminals, spy on, give chase, and attack, law abiding citizens,
then they are the authors of their own misfortune should they find
themselves injured in the fighting instigated by their marauding companions.

Contributory Negligence

406. Plaintiffs actions were partly or wholly the cause of their claimed injuries.

407. As one of countless examples, Plaintiffs disobeyed a police order to disperse.

Duress and Self Defense

408. Defendants' claimed actions were taken in self defense while defendants were being unlawfully assaulted or otherwise mistreated.

409. For all Defendants, and especially Defendant Cantwell, there was ample cause to fear and respond to violence from Plaintiffs and their criminal co-conspirators.

410. In the lead up to the July 8th demonstration, cited in Plaintiffs' complaint, the "Virginia Anti-Fascist Front" advertised their plans to attack demonstrators at the "Battle of Charlottesville" by saying "NO QUARTER

FOR RACISTS, BIGOTS, OR HOMOPHOBES"

<http://www.facebook.com/VAntifa/>



Virginia Antifascist
Front
@VAantifa

Home

Posts

Photos

About

Community

Events

[Create a Page](#)

Like Share Suggest Edits ...

STAND AGAINST THE KKK

THE BATTLE OF CHARLOTTESVILLE
- NO QUARTER FOR RACISTS,
BIGOTS, OR HOMOPHOBES -

JULY 8 CHARLOTTESVILLE CIRCUIT COURT BUILDING 315 E HIGH ST.

Community

Community See All

599 people like this

724 people follow this

About See All

Community

People

599 likes

People Also Like

Militants Against Fascist Amerika Political Organization

Kindness Revolution: Acts of Lo... Community

411. As previously mentioned, Charlottesville Resident Emily Gorcenski Tweeted on August 9th 2017 "We throw bricks so y'all [expletives] can have proggy feels about gay marriage"



Emily Ghoulcenski @EmilyGorcenski · Aug 9, 2017

Here's an idea: white cis men don't get a say in how trans women of color respond to gender and racial oppression.

8

11

86

↑



Emily Ghoulcenski @EmilyGorcenski

We throw bricks so y'all motherfuckers can have proggie
feels about gay marriage

8:22 AM · Aug 9, 2017 · Twitter for Android

2 Retweets 41 Likes

412. Bradley "Chelsea" Manning, who had been imprisoned for betraying his country by leaking military secrets to Wikileaks, had been tweeting encouragement for Leftist violence at Defendants' demonstration, including, in a since deleted tweet, this image of his boot coming down toward the camera, seemingly to give the impression of it coming down on the viewer's face.



413. Plaintiffs' associates, including Thomas Massey, if not Plaintiffs themselves, had been present at the Inauguration Day riots in Washington DC, and called for the release of those arrested at that event, which left us with such breathtaking images as this burning limousine.



414. Throughout the events of the weekend in question, Defendants wisely kept an eye on one website more than any other, ItsGoingDown.org (IGD herein), which had long been known as a clearinghouse for violent Antifa propaganda, having sung the praises of such remarkable characters as Dallas Black Lives Matter Cop Killer Micah Johnson.

<https://itsgoingdown.org/briefly-violence-police/>

<https://itsgoingdown.org/clarity-rupture-dallas-los-angeles/>

415. Defendant Cantwell personally had the terribly frightening experience of seeing his picture on the IGD website, when a Tweet from the aforementioned Emily Gorcenski was embedded in a post announcing Defendants' plans for the Torch March.

<https://itsgoingdown.org/charlottesville-va-unite-right-plans-friday-surprise-torchlit-rally-uva/>



Emily Ghoulcenski

@EmilyGorcenski

Cantwell getting questioned by cops after allegedly brandishing a gun.



29 1:26 PM - Aug 11, 2017



17 people are talking about this



- a. That brandishing accusation was 100% false. When police arrived, Defendant Cantwell offered them his body camera video to prove the accusation was false.
- b. Since the complainant did not want to be caught filing a false report, they did not present themselves to law enforcement.

c. Plaintiffs' counsel know this, because they have had the video which saved Defendant Cantwell from jail that afternoon, for over a year.

d. The text of the IGD post read as follows:

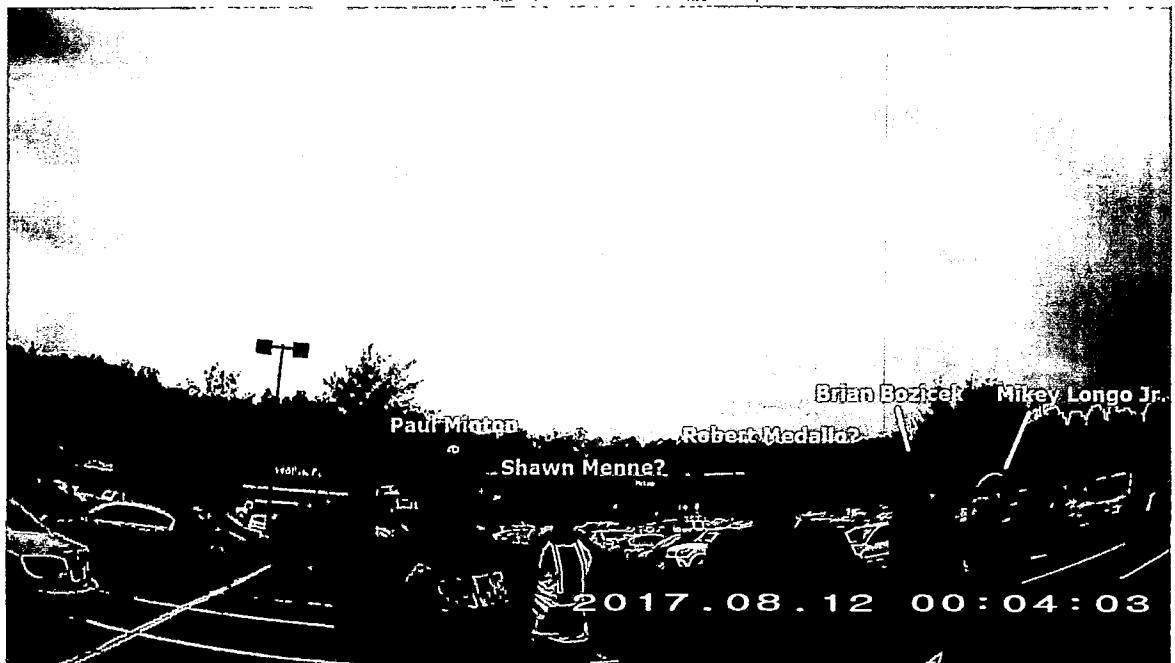
Earlier today, a right-wing gathering at the local Walmart ended with Christopher Cantwell, a white nationalist speaker at Unite the Right who was once quoted as saying, "Let's fucking gas the kikes and have a race war," pulled a gun on a customer who confronted them in the parking lot. Police surrounded his followers within minutes but then allowed them to reconvene in McIntire Park.

This response from police is especially alarming. Fash are already prowling Charlottesville, with reports of churches being harassed. As IGD reported today, the right's leaders are documented calling for armed violence against anyone who crosses them.

It's beyond obvious that this is not about free speech but terrorism. Charlottesville's Black and brown folks must be protected at all costs, but the police don't seem to care.

Will UVA and its community take action to stand against white supremacist terrorism on campus? Will Charlottesville allow a torchlit rally to go down in city limits again?

e. Who was the “Customer” who confronted Cantwell? It was Philly Antifa.



f. Former Federal Prosecutor Tim Heaphy's independent investigation rightly noted that this attempt to frame Defendant Cantwell was "The first hint of trouble on August 11" (See Exhibit12-Heaphy.pdf) or

<http://ftpcontent.worldnow.com/wvir/documents/heaphy-reveiw-dec-1.pdf>

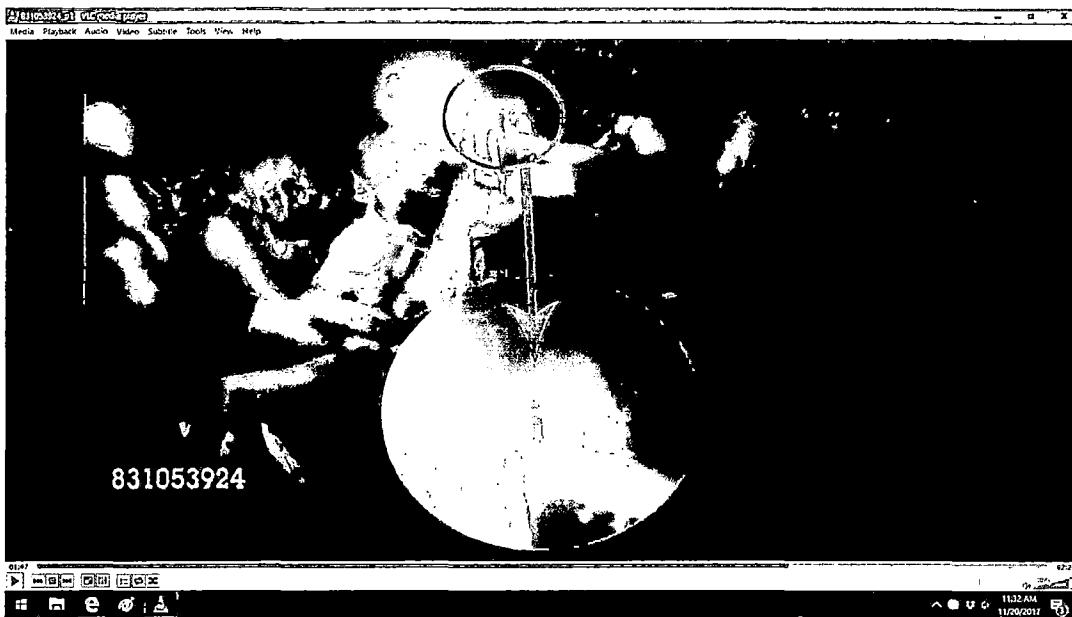
g. Not only was this the first hint of trouble. It was, as the IGD post illustrates, used as war propaganda, and a pretext for the Leftist aggressions to follow. Philly Antifa tried to frame Cantwell for brandishing, while Gorcenski took pictures to be published, and when the police rightly set Cantwell free, IGD tried to portray the incident

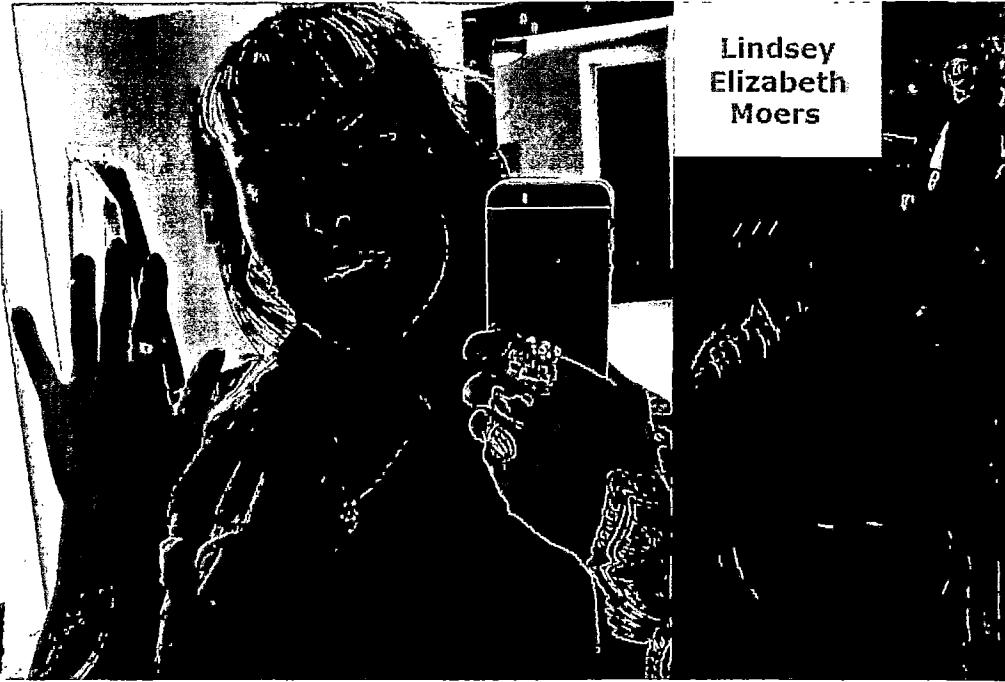
as though police were collaborating with Nazis to oppress non-Whites, and called for vigilante violence to stop this manufactured threat.

h. Obviously, it was Defendants who had the need to be fearful, having already been framed for a crime once that day, and featured on a communist website that praises cop killers, rioters, arsonists, and terrorists.

416. Plaintiffs' criminal Antifa co-conspirators, if not Plaintiffs themselves, came to the gun free zone of UVA armed with guns, expandable batons, and pepper spray, to name just a few of their instruments of terror.

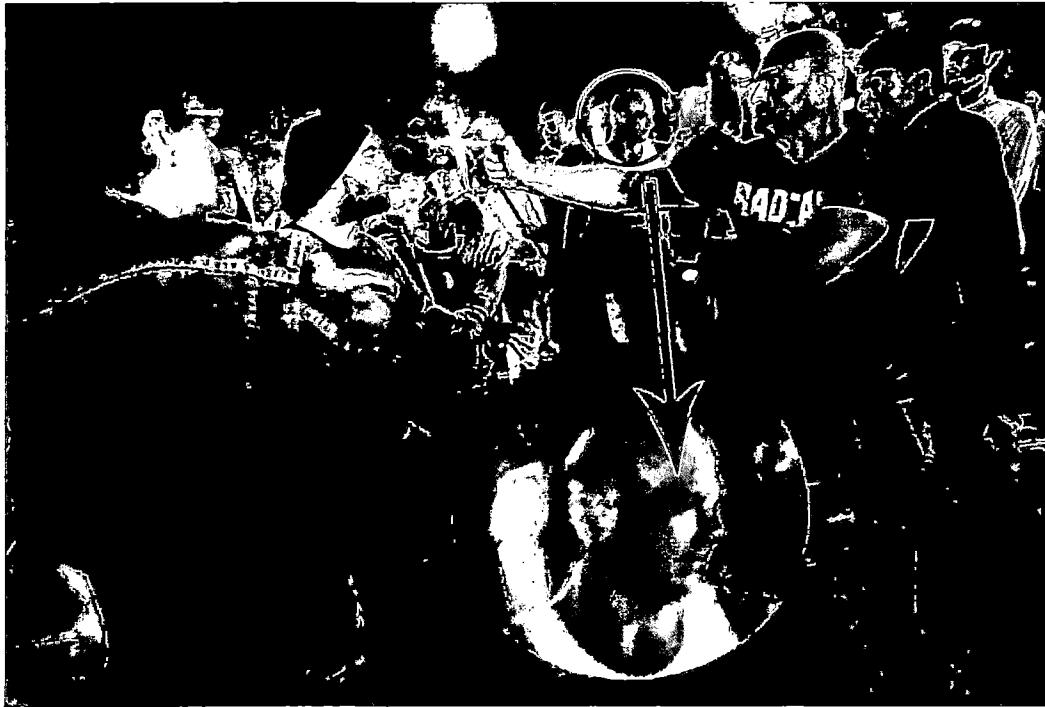






417. Violent criminal Thomas Massey threw the first punches of the fight, as can be seen from multiple angles in the last seconds of Exhibit1-Charge.mp4, as well as in Exhibit2-Attack.mp4, Exhibit3-Fight.mp4, and Exhibit4-CantwellDefends.mp4

418. In the much talked about photograph of Cantwell deploying his pepper spray, we can see the injury Massey inflicted on Cantwell's associate.



Illegality

419. Plaintiffs actions were unlawful, or knowingly associated with persons whose actions were unlawful, and Plaintiffs' misconduct is itself the proximate cause of their injuries; For example

420. Plaintiffs' associates illegal brought at least one firearm to the UVA campus

421. Plaintiffs' associates assaulted Defendants

422. Plaintiffs' and their associates disobeyed a police order to disperse.

Willful and Malicious Material Deceptions Upon this Court

423. Plaintiffs have repeatedly, knowingly, maliciously, and materially deceived this Court throughout their filings. Motivated by malice toward Defendants, ideological bias, political incentives to limit Defendants' impact on political discourse and important elections, contempt for Defendants' constitutional rights, and want of financial gain, they have misquoted, inferred non-existent motivations from normal behavior, purposely shielded their own eyes from the truth, and outright fabricated lies.

424. Plaintiffs state no less than five times, in paragraphs 97, 175, 192, 232, and 349 that Defendants "took no step to prevent" or "failed to take any steps to prevent" the violence that took place. When they knew full well that

- a. Defendants applied for a permit.
- b. Defendants tried to keep their plans secret, to avoid confrontations with Plaintiffs.
- c. Defendants declined to engage Plaintiffs' Antifa criminal co-conspirators when they had a choice, such as in the Walmart parking lot.
- d. Defendants called law enforcement to coordinate the UVA torch march, and specifically that Defendant Cantwell conditioned his participation in that event on police being present. (See Exhibit10-MeetClip.mp3)
- e. Cantwell repeatedly warned his audience to remain in compliance with the law, especially if they were carrying weapons.

- f. Cantwell wore a body camera throughout the events in dispute.
- g. Cantwell warned his party not to engage Philly Antifa in the Walmart parking lot on August 11th.
- h. While Cantwell was recovering from Mike Longo Jr.'s pepper spray assault, someone he could not say said "We're gonna kill em!" and Cantwell replies "Don't kill anybody!" See Exhibit9-DontKill.mp4

425. In Paragraph 163 of the second amended complaint, Plaintiffs assert that "*Hundreds of neo-Nazis and white supremacists, including Defendants Kessler and Spencer, charged toward a small group of fewer than 30 people, mostly students and community members, including Plaintiffs John Doe and Romero, who had locked arms around the statue of Thomas Jefferson.*" Also, in Paragraph 164, Plaintiffs assert that "*Defendants and their co-conspirators rushed down the steps that surround the Rotunda and streamed toward the Jefferson statue...*" In Paragraph 165, Plaintiffs assert that "*As they reached the statue, Defendants and co-conspirators stood shoulder to shoulder and encircled the students to trap them.*"

- a. In fact, defendants slowly and calmly walked down the stairs, as evidenced by dozens of videos, including Exhibit1-Charge.mp4, attached.
- b. As shown in Exhibit1-Charge.mp4, attached, Plaintiffs had no less than 1 minute and 40 seconds, as Defendants slowly and calmly

surrounded the statue, as had been their plan since before the Plaintiffs and their Antifa criminal associates attempted to disrupt their event. This left ample opportunity for Plaintiffs to flee the scene if they felt threatened by Defendants, or otherwise saw fit.

426. Plaintiffs repeatedly, throughout their complaint make laughably strained use of quotation marks, and in this case, periods, which is a conspicuous habit, indicative of their enthusiasm for deceiving this Court and the public. Buried amidst inflammatory statements by unnamed and pseudonymous “participants” and “co-conspirators” who for all we know are Plaintiffs and their criminal associates, in Paragraph 150 of Plaintiffs’ second amended complaint, Plaintiffs state *“On the morning of August 11, Cantwell and other co-conspirators gathered at a Walmart outside of Charlottesville. Cantwell then traveled to McIntyre Park to prepare for the evening. In an interview with a reporter from Vice, Cantwell said ‘I’m trying to make myself more capable of violence ... I’m here to spread ideas, talk, in the hopes that somebody more capable will come along and do that’”*

- a. This “quote” as we will illustrate in greater detail momentarily, is actually part of two completely different parts of an interview roughly 30 minutes apart from one another, and in no way materially related to one another.
- b. The first quote is in response to a question by Elle Reeve;

Reeve: “*You were asking whether White people were capable of violence*”

Cantwell replies: “*I didn’t say capable. Of course we’re capable. I’m carrying a pistol. I go to the gym all the time. I’m trying to make myself more capable of violence. We conquered the entire planet. We built the most powerful militaries in the history of mankind. It’s the inclinations and aptitudes, right? When White people want to kill people, they go and join the [expletive] military, right?*”

- c. Clearly, Defendant Cantwell is talking about a general capacity for violence in a wholly lawful sense. He references his licensed pistol, which he trains with at the firing range, to remain skilled in its use. He references his exercise regimen, which necessarily makes him a more formidable opponent in a physical altercation, try though he may to avoid them. He specifically references the wholly lawful example of joining the military, and in particular the historic military prowess of majority White Nations throughout the history of mankind.
- d. To imply this is part of a criminal conspiracy is to knowingly deceive the Court, but it gets worse.
- e. Roughly 30 minutes later, Cantwell says “*I am not under the impression that I, personally, am going to save my Race & Nation.*

Okay? I'm here to spread ideas, talk, and frankly enjoy myself, in the hopes that somebody more capable will come along and do that."

- f. On a completely different subject now, Cantwell is talking about someone like the President of the United States coming to power, who would thereby necessarily be far more capable than Defendant Cantwell, but is more in line with Cantwell's views than our current President.
- g. There is no violence here referenced, save for the coercive power inherent in any political entity.
- h. Plaintiffs deceptively stripped context, and then pieced these two completely different subjects together for the purposes of maliciously and materially deceiving this Court, so as to cause the maximum possible harm to Defendant Cantwell.
- i. This "quote" was cited in Judge Moon's denial of Defendant Cantwell's motion to dismiss, as he stated in his decision "On the morning of the 11th, he told a reporter that he was '*trying to make [himself] more capable of violence.*'"
- j. By maliciously and materially deceiving Judge Moon, Plaintiffs necessarily impacted the Judge's thought process, and potentially, the outcome of that decision.

k. For anyone interested in the truth, the entire unedited audio of both interviews with Vice News from that weekend is available for download as Episode 342 of the Radical Agenda, and has been since August 14th 2017. It is implausible that Plaintiffs' investigation, with its \$10,000,000+ budget, did not uncover this well prior to discovery being handed over. Still, it was handed over during discovery, more than a year ago. They must be presumed to have full knowledge of its contents.

<https://christophercantwell.com/2017/08/14/radical-agenda-ep342-full-vice-interview/>

427. Defendant Cantwell was again amused by Plaintiffs' creative use of quotation marks, in Paragraph 106 of their second amended complaint, and once again calls the Court's attention to Plaintiffs' repeated, intentional, and clearly malicious duplicity. Likewise buried amidst inflammatory statements by unnamed and pseudonymous "participants" and "co-conspirators", Plaintiffs note in Paragraph 106 of their amended complaint "*Defendant Cantwell expressly 'encourage[d] Radical Agenda followers 'to carry a concealed firearm"*

a. This strained effort to form a "quote" comes from a blog post on ChristopherCantwell.com titled "Unite the Right Updates" which was posted on August 8th, and updated August 9th. The full post can be

found here, for those more interested in context than Plaintiffs and their co-conspirators. <https://christophercantwell.com/2017/08/08/united-right-updates/>

- b. Below, is a larger snippet from the August 9th update, to show the court how dishonest this was.
- c. The Daily Stormer has issued a call for people to show up, permit or none, and given some advise [sic] on what to bring and what not to bring. Their advice is to leave your firearms at home, and if you must bring a firearm, please conceal it.

Many of you have asked about meeting up with me personally. Since the main event is likely to be chaotic, we might have trouble catching up at the main event. I am working on coordinating a meetup for Radical Agenda listeners on Friday, but I have to be careful about how the details are announced. Sadly, anything I say to you here, I also say to the media, communists, and other criminal elements. For this event, I encourage those with the legal authority, to carry a concealed firearm. Open carry will draw more unnecessary attention to us, so if you do not have a license to carry, please secure your firearms elsewhere and let us worry about defense.

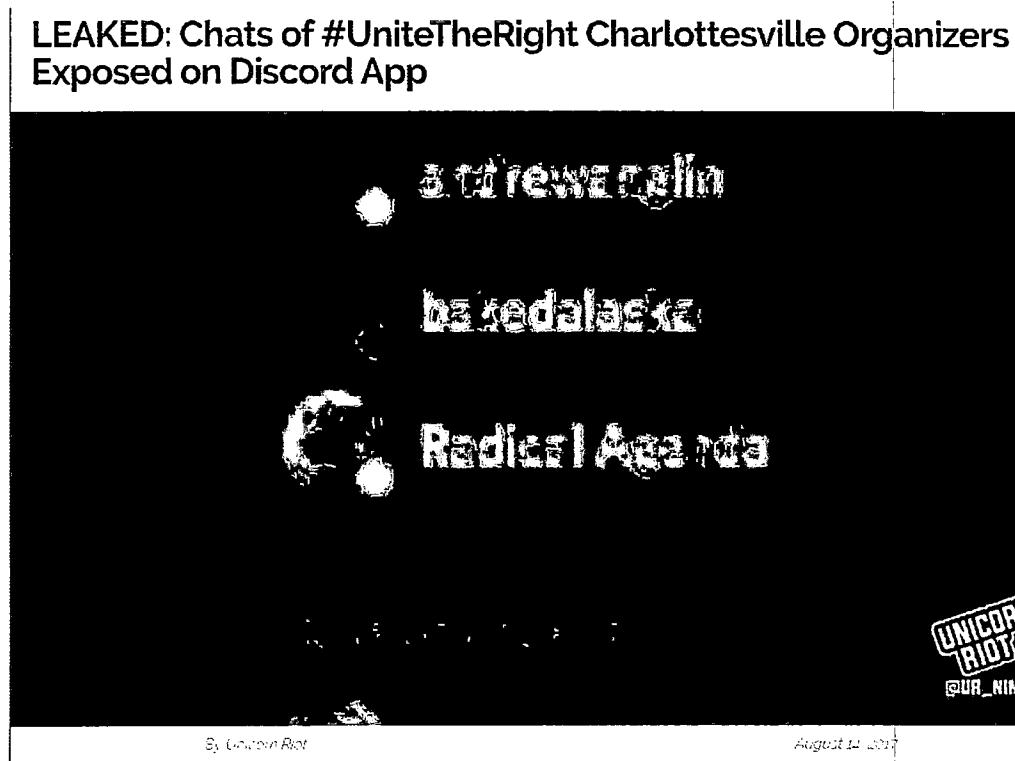
- d. Defendant Cantwell calls the Court's attention to his concern for obedience to the law, and warning to his audience against provocative, though perfectly legal, open carry displays of firearms at this event.
- e. Defendant Cantwell would also like to draw the court's attention, to his prudent, though ultimately unsuccessful, effort to avoid ever coming into contact with Plaintiffs and Plaintiffs' co-conspirators at this event. Plaintiffs' co-conspirators went to extraordinary lengths to track, confront, and make false allegations against Defendant Cantwell.
- f. The event the here referenced, it is worth noting, was wholly separate from those at the heart of this case. This quote was pulled from suggestions for the Radical Agenda Listeners' Meetup, the aforementioned Walmart Parking lot incident, at which no violence ensued, despite the best efforts of Philly Antifa to provoke it.
- g. This "quote" was cited in Judge Moon's denial of Defendant Cantwell's motion to dismiss, when he stated "*He used his various platforms to advise[] rallygoers on bringing weapons.*"
- h. This willful and malicious material deception perpetrated upon the Court, surely played a substantial role in Judge Moon's decision-making process, and potentially, the outcome of the motion to dismiss.

- i. Plaintiffs had to know this would come out at trial, and perpetrated this deception so as to cost Defendant Cantwell the cost of attorneys' fees, time, emotional distress of this process, and especially to hinder his ability to participate in American political discourse.

428. Plaintiffs' conspiracy theory rests heavily on inflammatory, though not incriminating, posts by users on the event's Discord Server, most of which are not attributed to any defendant, and cannot in any way be attached to Defendant Cantwell.

- a. Cantwell sent a total of 13 messages to the Discord server, the first of which dated August 1st, 2017.
- b. Defendant Cantwell's total of 13 messages to the Charlottesville 2.0 Discord server, which can be seen in Exhibit16-CantwellDiscord.pdf
- c. or <https://discordleaks.unicornriot.ninja/discord/user/1436>
- d. Plaintiffs have been well aware of this since before filing this suit, as the Discord logs were made public by Unicorn Riot on August 14th 2017, and the initial complaint relied heavily on those leaked records. <https://unicornriot.ninja/2017/white-supremacists-unite-the-right-charlottesville-plans-exposed-discord-app/>
- e. Conspicuously, despite his scant use of the service, Unicorn Riot nonetheless saw fit to prominently feature Defendant Cantwell's user

profile in the header image in the blog post announcing the leaks. For this reason, along with their specific false assertions outlined below about Cantwell's Discord participation, it is implausible that Plaintiffs did not know which profile belonged to Defendant Cantwell.



- f. On Discord, Defendant Cantwell was not, to his knowledge, granted any special access to secret or leadership channels, nor any moderation privileges. Nor have Plaintiffs alleged so. It is possible he was granted such access and was unaware of it though, since Defendant Cantwell hardly used the Discord Server.
- g. Defendant Cantwell had, prior to the events in dispute, set up a Discord server for Radical Agenda listeners, which Unicorn Riot has

not leaked, yet. That server was not used in any meaningful way for coordinating the events here in dispute, certainly was not used to formulate any criminal conspiracies, and Defendant Cantwell gladly provided his Discord user credentials during discovery to confirm this fact.

- h. Despite knowing this, in Paragraph 73 of Plaintiffs second amended complaint, Plaintiffs assert “*Individual Defendants, including Heimbach, Parrott, Cantwell, and Ray, were all participants on Discord, and participated in the direction, planning, and inciting of unlawful and violent acts through Discord*
 - i. At least so far as it pertains to Defendant Cantwell, this was a malicious and willful effort to deceive this Court, as evidenced by the lack of any such posts in the records.

i. Despite knowing this, in Paragraph 101 of Plaintiffs’ second amended complaint, Plaintiffs assert “*Co-conspirators on Discord incited attendees to bring weapons and engage in violence. This incitement was known to and promoted by Defendants.*”

 - i. At least so far as it pertains to Defendant Cantwell, this was a malicious and willful effort to materially deceive this Court, as evidenced by the lack of any such posts in the records.

- j. Discord was certainly replete with violent language and imagery, most of which was clearly in jest, some, even literally cartoonish. In the case of some Defendants, it may be up for debate whether not these materials implicate them in violent or criminal activity. But no such posts can be attributed to Defendant Cantwell, nor did Defendant Cantwell have any control over them, and Plaintiffs knew this fact before filing this suit.
- k. Nor did Plaintiffs have any good faith reason to believe that Defendant Cantwell had any knowledge of these posts, given the first message Defendant Cantwell sent to the Discord server was dated August 1st and read "*Hey guys, I'm just popping my head in to show my face. I don't use Discord much, but I see a lot of alt righters using it, so perhaps I should start.*"
- l. Despite this first message being posted on August 1st 2017, Judge Moon incorrectly noted in his denial of Defendants' motion to dismiss, that Defendant Cantwell "was an active participant on Discord in the months leading up to the event."
- m. This misconception by Judge Moon was facilitated by Plaintiffs' willing and malicious effort to deceive this Court by overplaying Cantwell's role as a leader, organizer, instructor, and issuer of orders, and as previously mentioned, stating specifically in Paragraph 73 of the second amended complaint "Individual Defendants, including

Heimbach, Parrott, Cantwell, and Ray, were all participants on Discord, and participated in the direction, planning, and inciting of unlawful and violent acts through Discord" as well as by lumping Cantwell in with other Defendants in Paragraph 101 by asserting "Co-conspirators on Discord incited attendees to bring weapons and engage in violence. This incitement was known to and promoted by Defendants".

- n. None of Cantwell's posts to the Charlottesville 2.0 Discord, nor any other Discord, nor any other platform, could in any conceivable way be honestly interpreted as leading, organizing, conspiring, instructing, or ordering the events here in dispute. Plaintiffs knew this before filing this suit, and this was thus a willful and malicious effort to materially deceive this Court.
- o. Nor could any of Defendant Cantwell's posts in the Charlottesville 2.0 Discord, nor any other Discord, nor any other platform, in any conceivable way be honestly interpreted as participating "*in the direction, planning, and inciting of unlawful and violent acts*" as alleged in Paragraph 72 of Plaintiffs second amended complaint. Plaintiffs knew this before filing this suit, and this was thus a willful and malicious effort to materially deceive this Court.
- p. Nor could any of Defendant Cantwell's posts to the Charlottesville 2.0 Discord, nor any other Discord, nor any other platform, in any

conceivable way be honestly interpreted to have “*incited attendees to bring weapons and engage in violence*” as alleged in Paragraph 101 of Plaintiffs second amended complaint. Plaintiffs knew this before filing this suit, and this was thus a willful and malicious effort to materially deceive this Court.

q. The material referenced above is a printout from the Unicorn Riot website. The aforementioned 13 messages are a search result for Cantwell’s user credentials across ALL of the Discord records leaked by Unicorn Riot. The only one of those servers Defendant Cantwell was a participant in, was the Charlottesville 2.0 Discord.

Highly Suspect Unnamed and Pseudonymous “Participants” and “Co-conspirators”

r. While it is well established above, that Defendant Cantwell had next to no involvement in the Discord Server, as Plaintiffs have maliciously and falsely alleged, it is worth noting that the vast majority of the supposedly incriminating statements outlined in Plaintiffs second amended complaint come from unnamed and pseudonymous “participants” and “co-conspirators” who, for all we know, could be Plaintiffs and Plaintiffs’ criminal co-conspirators, such as Antifa.

s. See Exhibit14-UnnamedandPseudonymous.pdf

- t. Unicorn Riot leaked 67 different Right wing Discord servers. This necessarily implies a deep infiltration of the ranks of Defendants' various associations which, given the invite only nature of the platforms, implies a great deal of deception had to have been involved.
- u. In support of their motion to enjoin Defendant Cantwell, Plaintiffs invoked the familiar name of one Emily Gorcenski. Gorcenski is a well known, and extremely dangerous, anarchist/Antifa extremist who was central to the Leftist conspiracies of the events here in dispute. (See Exhibit13-GorcenskiDangerousAntifa.pdf attached)
- v. Emily Gorcenski and others bragged about their "intel networks" successful efforts to "plan, disrupt, monitor, and respond" to Defendants activities during the events here in dispute. Gorcenski bragged in the Tweet below about their "intel networks" discovering Defendant Cantwell's Walmart meetup, the details of which were only published behind the paywall of Defendant Cantwell's website, indicating that well prior to the events here in dispute, Gorcenski's co-conspirators went so far as to give Defendant Cantwell money to spy on him. Given how they "outclassed the cops" it is certain their "intel networks" likewise penetrated the Discord Server.
- w. Recently, Gorcenski was trying to fend off accusations of being a "Fed" from fellow criminal co-conspirators, and disclosed a refusal to call law enforcement to the torch march, in stark contrast to Defendants.

- x. Given these facts, none of the posts from unidentified "participants" and "co-conspirators" should be given any weight by this Court.
- y. In any case, while this guilt by association may be used to describe the moderators as derelict in their duties, it is nothing short of defamatory to associate Defendant Cantwell with such material, as he had no knowledge of it, nor any capacity to do anything about it.

429. Cantwell did not conspire with any person.

430. Cantwell did not injure Plaintiffs, or any innocent person, nor have Plaintiffs alleged any injury caused by Cantwell.

431. With the singular exception of the Radical Agenda Listeners' Meetup at Walmart and McIntyre Park on the morning of August 11th, at which no violence ensued, and no claims are here alleged, Cantwell was not an organizer, leader, moderator, or "conspirator". He was in no position to issue "orders" or "instructions" to anyone at any time during the events here in dispute. No evidence exists for this assertion, even after discovery, and in fact, there is an abundance of evidence to the contrary.

432. Anything not specifically and explicitly admitted as true in this answer is denied.

433. Defendant gives notice that he is reserving the right to assert additional defenses as such become known to him.

This Suit Never Had Merit, and Plaintiffs Always Knew It

No honest person who reviews the evidence in this case can plausibly claim to believe the Plaintiffs' story, Plaintiffs and Plaintiffs' counsel, least of all. The entire thing always was a sham, and the entire narrative was deceptively and intentionally crafted, well prior to any of the Defendants even arriving in the city.

Plaintiffs' counsel, knowing that a trial will inevitably expose this fraud, have sought to make the process as painful, expensive, time consuming, humiliating, and intrusive as possible, culminating in the recent motion to enjoin Defendant Cantwell.

But before they did that, as the Jewish Telegraphic Agency put it in the article about Kaplan's Interview, "Kaplan's team has obtained reams of information" on their opponents and critics, which will surely come in handy for decades to come.

Plaintiffs and Plaintiffs' counsel could not possibly have believed certain aspects of their own complaint when they filed it. Other aspects they might have genuinely convinced themselves of out of sheer ideological bias, without evidence, which is still negligent at best. Their well-financed investigation, and profoundly intrusive discovery, surely dissuaded them by now from any good faith errors made in the beginning.

Rather than admit their errors, and free the targets of their enmity from this abuse of our Courts, they have doubled down, and sought motions for no other purpose than to salt wounds and twist blades.

Their malice is on display throughout the complaint and subsequent motions.

Describing Defendants as “vile” and “obscene”. Placing “rally” and “security” and “secret” and “defense” in quotations throughout, as though Defendants could not conceivably have a rally, or be entitled to security, secrets, or self defense. All that’s missing is marking up “rights” in the same fashion, which one might suspect proved tempting for Plaintiffs.

In their minds, which are so overcome with certainty of their own moral superiority, there can be no legitimacy to the “other side”. While Defendants describe themselves as “White Nationalists” or “National Socialists” or “Pro-White” or “Alt Right”, Plaintiffs insist on the more inflammatory terms “White Supremacist” and “neo-Nazi” and “Klansmen”, using all such epithets interchangeably, and baselessly inserting “violent” and “hate” as adjectives throughout.

As far as Plaintiffs are concerned, there are only people who agree with them, and criminals who must be punished. Literally. This bias is replete, not only throughout this abuse of our Courts, but throughout all of our political discourse today. The President of the United States said there were “fine people on both sides” that weekend, and Plaintiffs, like too many others, insist this is impossible.

So far as Plaintiffs are concerned, they are the good, kind, decent folks, even the violent criminals they conspire with. The “other side” are violent criminals, even those who only speak their mind in disagreement with the fundamentalist religion of egalitarianism, which Plaintiffs take as Gospel.

This must be repaired. Not only in this matter, but in our country, or not only will our society unravel, it will be set against itself in mortal enmity. That could well result in a conflict where the survivors are not the most fortunate ones, as has been seen more than a few times throughout Man's tragic history.

Plaintiffs and their counsel would be well served to contemplate the long term ramifications of this. Their grip on power, it was shown in 2016, is not so absolute as they would like to think, and they'll have stop blaming Russia, at some point. Their desperate actions in this and other matters, show that they recognize the possibility of folks like Defendant Cantwell getting in proximity to power.

When Plaintiffs become "the other side," they will certainly hope Defendants recognize that "the other side" has "rights", and treat them, better than they treated us.

DEFENDANT'S PRAYER FOR RELIEF

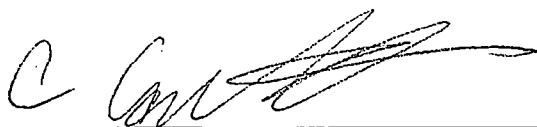
WHEREFORE, the premises considered, Defendant Cantwell requests the following relief:

- a. entry of a judgment in favor of Defendants against each Plaintiff and dismissal of the Second Amended Complaint with prejudice;
- b. an award of all costs; and
- c. an award of such other or further relief as this Court might deem just and proper.

Respectfully submitted,

Christopher Cantwell

November 6th 2019



Defendant Signature

Date